

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

DAVID KISSI

*

Plaintiff

*

v.

*

CHRISTOPHER MEAD; ESTATE FOR
FRED W. BENNETT; BENNETT & BAIR;
GARY BAIR; MICHAEL RAY PEARSON;
RONALD SCHWARTZ; BENJAMIN
CIVILETTI; VENABLE, LLP; MICHAEL
SCHATZOW; MICHAEL HECHT; MARIA
ELLENA CHAVEZ RUARK; DLA PIPER;
RICHARD E. GREENBERG,

* Civil Court Action No.:

*

*

*

*

Defendants

*

* * * * *

NOTICE OF REMOVAL

EXHIBIT 5

CA Form 1

Superior Court of the District of Columbia

CIVIL DIVISION

**500 Indiana Avenue, N.W., Room JM-170
Washington, D.C. 20001 Telephone: 879-1133**

DAVID KISSI

Plaintiff

08-0007001

vs.

Civil Action No. _____

DLA PIPER

Defendant

SUMMONS

To the above named Defendant:

You are hereby summoned and required to serve an Answer to the attached Complaint, either personally or through an attorney, within twenty (20) days after service of this summons upon you, exclusive of the day of service. If you are being sued as an officer or agency of the United States Government or the District of Columbia Government, you have sixty (60) days after service of this summons to serve your Answer. A copy of the Answer must be mailed to the attorney for the party plaintiff who is suing you. The attorney's name and address appear below. If plaintiff has no attorney, a copy of the Answer must be mailed to the plaintiff at the address stated on this Summons.

You are also required to file the original Answer with the Court in Room JM 170 at 500 Indiana Avenue, N.W., between 8:30 a.m. and 5:00 p.m., Mondays through Fridays or between 9:00 a.m. and 12:00 noon on Saturdays. You may file the original Answer with the Court either before you serve a copy of the Answer on the plaintiff or within five (5) days after you have served the plaintiff. If you fail to file an Answer, judgment by default may be entered against you for the relief demanded in the complaint.

Clerk of the Court

DAVID KISSI

Name of Plaintiff's Attorney

By Adrienne J. Marsh
Deputy Clerk

Address
KISSI
325 PENNSYLVANIA AVE, SE
WASHINGTON, DC 20003

Date 9/26/2008

Telephone
202-668-4154

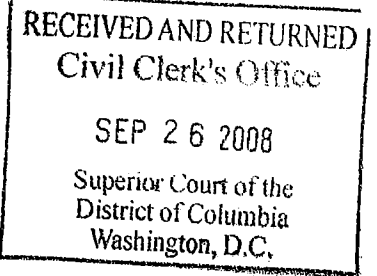
PUEDE OBTENERSE COPIAS DE ESTE FORMULARIO EN ESPANOL EN EL TRIBUNAL SUPERIOR DEL DISTRITO DE COLUMBIA, 500 INDIANA AVENUE, N.W., SALA JM 170

YOU MAY OBTAIN A COPY OF THIS FORM IN SPANISH AT THE SUPERIOR COURT OF D.C., 500 INDIANA AVENUE, N.W., ROOM JM 170

IMPORTANT: IF YOU FAIL TO FILE AN ANSWER WITHIN THE TIME STATED ABOVE, OR IF, AFTER YOU ANSWER, YOU FAIL TO APPEAR AT ANY TIME THE COURT NOTIFIES YOU TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY DAMAGES OR OTHER RELIEF DEMANDED IN THE COMPLAINT. IF THIS OCCURS, YOUR WAGES MAY BE ATTACHED OR WITHHELD OR PERSONAL PROPERTY OR REAL ESTATE YOU OWN MAY BE TAKEN AND SOLD TO PAY JUDGMENT. IF YOU INTEND TO OPPOSE THIS ACTION, DO NOT FAIL TO ANSWER WITHIN THE REQUIRED TIME.

If you wish to talk to a lawyer and feel that you cannot afford to pay a fee to a lawyer, promptly contact one of the offices of the Legal Aid Society (624-1161) or the Neighborhood Legal Services (682-2700) for help or come to Room JM 170 at 500 Indiana Avenue, N.W., for more information concerning places where you may ask for such help.

At the D.C. Superior Court
500 Indiana Avenue, NW
Washington, DC 20001



David Kissi,
38348-037
Federal Satellite Low Elkton
PO Box 10
Lisbon, OH 44432

Plaintiff

v.

08-0007001
Civil Case #:

Christopher Mead
London & Mead
1225 19th St., NW
Washington, DC 20036

Defendants

Estate for Fred W. Bennett
6301 Ivy Lane, Suite 418
Greenbelt, MD 20770

Bennett & Bair
6301 Ivy Lane, Suite 418
Greenbelt, MD 20770

Gary Bair
6301 Ivy Lane, Suite 418
Greenbelt, MD 20770

Michael Ray Pearson
6301 Ivy Lane, Suite 418
Greenbelt, MD 20770

Ronald Schwartz
4907 Niagara Rd., Suite 103
College Park, MD 20740

Benjamin Civiletti
Venable, LLP
575 7th Street, NW
Washington, DC 20004

Venable, LLP
575 7th Street, NW
Washington, DC 20004

Michael Schatzow
Venable, LLP
1800 Mercantile Bank and Trust Building
2 Hopkins Plaza
Baltimore, MD 21201

Michael Hecht
Venable, LLP
1800 Mercantile Bank and Trust Building
2 Hopkins Plaza
Baltimore, MD 21201

Maria Ellena Chavez Ruark
DLA Piper
6225 Smith Ave
Baltimore, MD 21209

DLA Piper
6225 Smith Ave
Baltimore, MD 21209

Richard E. Greenberg
Friedlander Misler
1101 17th Street, NW, Suite 700
Washington, DC 20036

Complaint for Recovery of Legal Fees and Emotional Distress
For a Nominal Judgment of \$10 Million
Against Plaintiffs for Conspiracy and Racketeering

That all the above Defendants were or are part of a broad conspiracy that chose to take the Plaintiff's assets without compensation. See 18 USC § 1951, 1957. That all the Defendants sought to deprive, at one time or other, whether knowingly or unknowingly, the Plaintiff of his civil rights and his right to life, liberty and happiness because of his African origin and his spouse as an African American. See 18 USC § 242, 245(b)(E).

That this Court should note that none of the above is protected by an Injunction issued by Federal Judge Peter J. Messitte against Plaintiff and his spouse. This has been clarified in Judge Messitte's Memorandum Opinion dated 6/19/08 which states that requests by Plaintiff Kissi for the return of legal fees is not part of the Injunction. See Exhibit A attached.

Jurisdiction

That this Court holds jurisdiction for the Plaintiff is a legal D.C. Resident, albeit, temporary guest of Uncle Sam at Camp Elkton from where he plans to return to D.C. on or before 12/2008. That all the Defendants have D.C. ties and the Venable law firm is located in the D.C. Chinatown area.

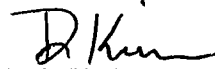
Demand for a Jury Trial

That Plaintiff reinstates his demand for a jury trial.

Conclusion

That for the Defendants violation of 18 USC § 1951, 1957, 242, 245(b)(E) and for causing the loss of the Plaintiff's \$3 million in assets, the loss of his million dollar 26 year old business enterprise and the emotional toll he and his wife and business entities have sustained, Plaintiff demands a jury award of \$10 million nominal judgment.

Respectfully Submitted by:



David Kissi
325 Pennsylvania Ave, SE
Washington, DC 20013

Certificate of Service

That on or about 9/22/08, Plaintiff did cause this Complaint to be served by the U.S. Postmaster per certified mail on:

1. Christopher Mead, London & Mead, 1225 19th St., NW, Washington, DC 20036
2. Estate for Fred W. Bennett, 6301 Ivy Lane, Suite 418, Greenbelt, MD 20770
3. Bennett & Bair, 6301 Ivy Lane, Suite 418, Greenbelt, MD 20770
4. Gary Bair, 6301 Ivy Lane, Suite 418, Greenbelt, MD 20770
5. Michael Ray Pearson, 6301 Ivy Lane, Suite 418, Greenbelt, MD 20770
6. Ronald Schwartz, 4907 Niagara Rd., Suite 103, College Park, MD 20740
7. Benjamin Civiletti, Venable, LLP, 575 7th Street, NW, Washington, DC 20004
8. Venable, LLP, 575 7th Street, NW, Washington, DC 20004
9. Michael Schatzow, Venable, LLP, 1800 Mercantile Bank & Trust Bldg, 2 Hopkins Plaza, Baltimore, MD
10. Michael Hecht, Venable, LLP, 1800 Mercantile Bank & Trust Bldg, 2 Hopkins Plaza, Baltimore, MD 21201
11. Maria Ellena Chavez Ruark, DLA Piper, 6225 Smith Ave, Baltimore, MD 21209
12. DLA Piper, 6225 Smith Ave, Baltimore, MD 21209
13. Richard E. Greenberg, Friedlander Misler, 1101 17th Street, NW, Suite 700, Washington, DC 20036



David Kissi

EXHIBIT A
page 1

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

PRAMCO II LLC

Plaintiff

v.

DAVID KISSI, et al.

Defendants

*
*
*
*
*
*
*
*
*

Civil No. PJM 03-cv-2241; *related cases*
Civil No. PJM 02-cv-42, Civil No. PJM
02-cv-43, Civil No. PJM 02-cv-44, Civil
No. PJM 08-cv-748

MEMORANDUM OPINION

The Court takes note of the multiple frivolous motions filed by Defendant David Kissi and his wife Edith Truvillion in this case.¹ Defendants have filed similar frivolous motions in the related cases *Pramco II LLC v. Kissi, et al.*, PJM 02-cv-42, *Pramco II LLC v. Kissi, et al.*, PJM 02-cv-43, *Pramco II LLC v. Kissi, et al.*, PJM 02-cv-44, and *Kissi, et al. v. Kremen, et al.*, PJM 08-cv-748.

All pending motions filed by Defendants in all the referenced cases are DENIED.

Cumulatively and individually, these motions continue the pattern of harassment that Defendants have engaged in throughout this litigation.

The mere fact that these motions have been filed does not entitle to Defendants to specific explanations as to why the motions are being denied, but the Court makes the following general findings:

All motions for recusal of the undersigned from sitting in these cases based on alleged bias, racial or otherwise, are fanciful.

¹ Some 42 such motions and other papers have been filed as of this date.

EXHIBIT A - Page 2

All requests for return of fees paid by Defendants in connection with these cases are matters between Defendants and their attorneys and have no place in this docket.

For the foreseeable future, the Court expressly declines to dissolve the preliminary injunction in effect in this case or to hold a hearing thereon. It is clear that even in the presence of the Preliminary Injunction, Defendants have taken actions suggesting total disregard of the injunction and inviting further contempt criminal proceedings (a matter to be addressed in time by this Court, United States District Judge Joseph R. Goodwin, or the United States Attorney).

Specifically, with regard to the suits filed in Ohio against Pramco, which this Court has never authorized, Defendants SHALL SHOW CAUSE in writing, if they have, in 30 days, why they should not be held in contempt of the Preliminary Injunction.

The Court has communicated with the U.S. District Court for the Northern District of Ohio and has advised that court of the existence of this Court's preliminary injunction and shall invite the Judges of that court to transfer their cases to Maryland. A copy of this Memorandum will be sent to United States District Judge Joseph Robert Goodwin, Assistant United States Attorney Barbara Sale, counsel of record in the captioned dockets, and Judges Lioi and Adams of the U.S. District Court for the Northern District of Ohio. Pending word from the U.S. Attorney in Maryland as to how the United States may decide to proceed, the Court will defer any contempt hearing in this Court. However, Defendants Kissi and Truvillion are nonetheless directed to respond in writing to the accompanying Show Cause Order within 30 days.

A separate Order WILL ISSUE.

June 19, 2008

/s/

PETER J. MESSITTE
UNITED STATES DISTRICT JUDGE

Filed
11/25/08
11:25 AM
U.S. District Court
District of Columbia

SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

Civil Division

DAVID KISSI,

Plaintiff,

v.

CHRISTOPHER MEAD, ET AL.

Defendants.

CASE NO: 2008 CA 007001 B

CALENDAR NO. 11

JUDGE: LYNN LEIBOVITZ

NEXT EVENT: Initial Scheduling
Conference on
January 16, 2009,
at 9:30 a.m.

PRAECIPE OF ENTRY OF APPEARANCE

The Clerk of Court will please enter the appearances of Aaron L. Handleman, Esquire (#48728), Justin M. Flint (#491728), Esquire, and Eccleston and Wolf, P.C. as counsel for Defendant Ronald Schwartz, Esquire in the above referenced matter.

Respectfully submitted,

ECCLESTON & WOLF, P.C

/s/

Aaron L. Handleman (No. 48728)

Justin M. Flint (No. 491782)

ECCLESTON AND WOLF, P. C.

2001 S Street, N. W., Suite 310

Washington, DC 20009-1125

(202) 857-1696

(202) 857-0762

handleman@ewdc.com

flint@ewdc.com

Attorneys for Ronald Schwartz, Esquire

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 12th day of November 2008, a copy of the foregoing Praecipe of Entry of Appearance was served by first class mail to:

David M. Kissi, Federal Inmate
No. 38348-037
FCI ELKTON
FEDERAL CORRECTIONAL INSTITUTION
P.O. BOX 10
LISBON, OH 44432

Christopher Mead
London & Mead
1225 19th St., NW
Washington, DC 20036

Estate for Fred W. Bennett
6301 Ivy Lane
Ste. 418
Greenbelt, MD 20770

Bennett & Bair
6301 Ivy Lane
Ste. 418
Greenbelt, MD 20770

Gary Bair
6301 Ivy Lane
Ste. 418
Greenbelt, MD 20770

Michael Ray Pearson
6301 Ivy Lane
Ste. 418
Greenbelt, MD 20770

Benjamin Civiletti
Venable, LLP
575 7th St., NW
Washington, DC 20004

Venable, LLP
575 7th St., NW
Washington, DC 20004

Michael Schatzow
Venable, LLP
1800 Mercantile Bank and Trust Bldg.
2 Hopkins Plaza
Baltimore, MD 21201

Michael Hecht
Venable, LLP
1800 Mercantile Bank and Trust Bldg.
2 Hopkins Plaza
Baltimore, MD 21201

Maria Ellena Chavez Ruark
DLA Piper
6225 Smith Ave.
Baltimore, MD 21209

DLA Piper
6225 Smith Ave.
Baltimore, MD 21209

Richard E. Greenberg
Friedlander Misler
1101 17th St., NW
Ste. 700
Washington, DC 20036

/s/
Justin M. Flint, Esquire